

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO,

Debtors¹.

PROMESA

Title III

Case No. 17-BK-3283(LTS)

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,

Debtor.

PROMESA

Title III

Case No. 17-BK-3566(LTS)

(Jointly Administered)

APPLICATION FOR ADMISSION *PRO HAC VICE*

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Comes now, Brad M. Kahn, (hereafter, the "Applicant") and, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, as incorporated by Rule 1001-l(b) of the Local Bankruptcy Rules as well as this Court's *Ninth Amended Notice, Case Management and Administrative Procedures Order* (Docket No. 7155 of Case No. 17-03283 (LTS)) (the "CMP Order"), hereby requests to be permitted to appear and participate in this particular case, in association with the law firm of McConnell Valdés, LLC, and the undersigned members of the bar of this Court, in representation of creditor and party-in-interest Monarch Alternative Capital LP, acting as investment adviser for certain investment funds, Applicant herein and respectfully states:

1. Applicant is an attorney and a member of the law firm of Akin Gump Strauss Hauer & Feld LLP, with offices at:

Address: One Bryant Park, New York, NY 10036
E-mail: bkahn@akingump.com
Phone: 212-872-1000
Fax: 212-872-1002

2. Applicant will sign all pleadings with the name "Brad M. Kahn"

3. Applicant has been retained as a member of the above-named firm by Monarch Alternative Capital LP, acting as investment adviser for certain investment funds, to appear on its behalf in the above captioned cases now pending before the United States District Court for the District of Puerto Rico, and without waiving any of its affirmative defenses, including insufficient process, insufficient service of process or lack of jurisdiction.

4. Since 2008, applicant has been and presently is a member in good standing of the bar of State of New York, where applicant regularly practices law. Applicant's New York bar license number is 4619235.

5. Applicant has been admitted to practice before the following courts:

Court:	Admission Date
New York State Bar	July 16, 2008

6. Applicant is a member in good standing of the bars of the courts listed in paragraph 5 of this Application.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding, or criminal charges before any court or jurisdiction.

9. During the past three (3) years, applicant has not filed for *pro hac vice* admission in the U.S. District Court for the District of Puerto Rico.

10. Local counsel of record associated with applicant in this matter is:

Leslie Y. Flores-Rodríguez, Esq.
MCCONNELL VALDÉS LLC
270 Muñoz Rivera Avenue, Suite 7
Hato Rey, Puerto Rico 00918
Tel: (787) 250-5628
Fax: (787) 759-8282
E-mail: lfr@mcvpr.com

11. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico, which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court".

WHEREFORE, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico.

Date: November 14, 2019.

Brad M. Kahn

s/ Brad M. Kahn

Signature of Applicant

I HEREBY CERTIFY THAT, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, that I consent to the designation of local counsel for all purposes.

Date, November 19, 2019

Leslie Y. Flores-Rodríguez

s/ Leslie Y. Flores-Rodríguez

Signature of Local Counsel

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19th day of November, 2019

I HEREBY CERTIFY that on this same date, we electronically filed the document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

MCCONNELL VALDÉS LLC
Attorneys for Monarch Alternative
Capital LP
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San Juan, Puerto Rico 00918
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By: s/Leslie Y. Flores-Rodríguez
USDC-PR No. 223601
Leslie Y. Flores-Rodríguez, Esq
Email: lfr@mcvpr.com

Court Name: District Court
Division: 1
Receipt Number: PRX100068330
Cashier ID: arodrigu
Transaction Date: 11/20/2019
Payer Name: AKIN, GUMP, STRAUSS, HAUER A
N

PRO HOC VICE
For: AKIN, GUMP, STRAUSS, HAUER AN
Case/Party: D-PRX-1-97-NA-000003-002
Amount: \$300.00

PAPER CHECK CONVERSION
Remitter: AKIN, GUMP, STRAUSS, HAUER AN
Check/Money Order Num: 486424
Amt Tendered: \$300.00

Total Due: \$300.00
Total Tendered: \$300.00
Change Amt: \$0.00

17-3283(LTS) PRO HAC VICE OF BRAD
M. KAHN

THRU: LESLIE Y. FLORES-RODRIGUEZ